

EPA Reg. Jacket 85678-40

PROCESSING REQUEST

Reg # 25678-40 Decision # 516787

Description:

Material Available Electronically (see PPLS):

☒ Electronic Label/Letter Dated

☐ Other:

Material Sent (see jacket):

☒ Stamped Label/Letter Dated 4-18-17

☐ Notification Dated

☒ New CSF(s) Dated 4-27-16

☐ Other:

File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.

Reviewer: Grant Rowland

Division: RD/HB

Phone: 347-0254

Date:



U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs
Registration Division (7505P)
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460

EPA Reg. Number:

85678-40

Date of Issuance:

4/18/17

NOTICE OF PESTICIDE:

☒ Registration
☐ Reregistration
(under FIFRA, as amended)

Term of Issuance:

Conditional

Name of Pesticide Product:

DICAMBA TECHNICAL

Name and Address of Registrant (include ZIP Code):

James M. Wagner
RedEagle International LLC
c/o Wagner Regulatory Associates, Inc
P.O. Box 640
Hockessin, DE 19707

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA section 3(c)(7)(A). You must comply with the following conditions:

1. Submit and/or cite all data required for registration/reregistration/registration review of your product under FIFRA when the Agency requires all registrants of similar products to submit such data.

Signature of Approving Official:

Kathryn Montague, Product Manager 23
Herbicide Branch, Registration Division (7505P)

Date:

4/18/17

2. Be aware that proposed data requirements have been identified in a Work Plan. For more information on these proposed data requirements, you may contact the Chemical Review Manager in the Pesticide Reevaluation Division:
<http://iaspub.epa.gov/apex/pesticides/f?p=chemicalsearch:1>
3. Make the following label changes before you release the product for shipment:
 - Revise the EPA Registration Number to read, “EPA Reg. No. 85678-40.”
4. Submit one copy of the final printed label for the record before you release the product for shipment.

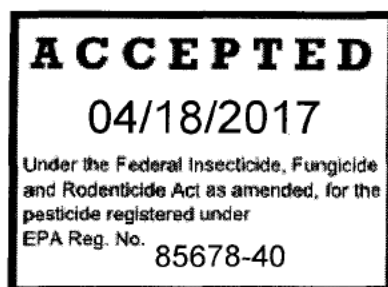
Should you wish to add/retain a reference to the company’s website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product’s label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA’s Office of Enforcement and Compliance.

If you fail to satisfy these data requirements, EPA will consider appropriate regulatory action including, among other things, cancellation under FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions. A stamped copy of the label is enclosed for your records. Please also note that the record for this product currently contains the following CSFs:

- Basic CSF dated 04/27/2016

If you have any questions, please contact Grant Rowland by phone at 703-347-0254, or via email at rowland.grant@epa.gov.

Enclosure



Dicamba Technical

For Manufacturing Purposes Only

Formulators who use this product are responsible for obtaining EPA registration for their formulated end-use products.

Active Ingredient:

Dicamba (3,6-dichloro-o-anisic acid) 98.76%

Other Ingredients: 1.24%

Total: 100.00%

KEEP OUT OF REACH OF CHILDREN DANGER/PELIGRO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
(If you do not understand the label, find someone to explain it to you in detail.)

FIRST AID	
IF IN EYES	<ul style="list-style-type: none"> • Hold eye open and rinse slowly with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
IF ON SKIN OR CLOTHING	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
IF SWALLOWED	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
NOTE TO PHYSICIAN	
Probable mucosal damage may contraindicate the use of gastric lavage.	
HOTLINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For 24-Hour Medical Emergency Assistance (Human or Animal) call: 1-800-222-1222 . For Chemical Emergency Assistance (Spill, Leak, Fire, or Accident) call CHEMTREC: 1-800-424-9300 .	

[See additional Precautionary Statements and Directions For Use on label.]

EPA Reg. No. 85678-XX

EPA Est. No. _____

Net Contents:

Manufactured For:

RedEagle International LLC
5143 S. Lakeland Dr., Suite 3
Lakeland, FL 33813

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
DANGER/PELIGRO

Corrosive. Causes irreversible eye damage. Harmful if swallowed or absorbed through skin. Do not get in eyes or on clothing. Avoid contact with skin. Wear protective eyewear (goggles, face shield, or safety glasses). Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminant clothing before reuse. Wear long-sleeved shirt and long pants, socks, shoes, and gloves. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

This product may only be used to formulate products that are registered and/or exempt from registration by the U.S. EPA. If the producer desires to formulate products that are not EPA approved, the producer is responsible for fulfilling all requirements for obtaining EPA registration.

Only for formulation into an herbicide for the following uses:

1. **Terrestrial Food:** Asparagus, corn, millet, small grains (barley, oats, teff, wheat), sorghum (including sudangrass), soybeans, and sugarcane;
2. **Terrestrial Non-Food Crop:** Conservation Reserve Program Areas, Cotton, fallow systems, farmsteads, fence rows, grass forage, fodder and hay (including grasses grown for seed), lawns, non-irrigation ditchbanks, pasture and rangeland, rights-of-way, roadsides, sod farms, and turf;
3. Uses for which US EPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration; and
4. Uses for experimental purposes that are in compliance with U.S. EPA requirements.

The user is responsible for determining the suitability of using this product for any specific purpose, and for the manufacturing practices employed, and to ensure proper safety precautions that may be required.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

Pesticide Storage: Store in original container in a well-ventilated area separately from fertilizer, feed, and foodstuffs. Avoid cross-contamination with other pesticides. For help with any spill, leak, fire or exposures involving this material call CHEMTREC 1-800-424-9300.

Pesticide Disposal: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

Container Handling:

Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container $\frac{1}{4}$ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Then offer for recycling, if available or puncture and dispose of in a sanitary landfill, or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

WARRANTY AND DISCLAIMER STATEMENT

NOTICE: Read the entire Directions for Use, Conditions, Disclaimer of Warranties and Limitations of Liability before using this product. If terms are not acceptable, return the unopened product container at once.

By using this product, user or buyer accepts the following Conditions, Disclaimer of Warranties and Limitations of Liability. Treatment of highly mechanically damaged seed, or seed of known low vigor and poor quality may result in reduced germination and/or reduction of seed and seedling vigor. Treat and conduct germination tests on a small portion of seed before committing the total seed lot to a selected chemical treatment. Due to seed quality conditions beyond the control of RedEagle International LLC, no claims are made to guarantee germination of carry-over seed.

CONDITIONS: The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of RedEagle International LLC. To the extent allowable under State law, all such risks shall be assumed by the user or buyer.

DISCLAIMER OF WARRANTIES: TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, REDEAGLE INTERNATIONAL LLC MAKES NO WARRANTIES, EXPRESS OR IMPLIED, OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE OR OTHERWISE, THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. No agent of RedEagle International LLC is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, REDEAGLE INTERNATIONAL LLC DISCLAIMS ANY LIABILITY WHATSOEVER FOR SPECIAL, INCIDENTAL OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT.

LIMITATIONS OF LIABILITY: TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER FOR ANY AND ALL LOSSES, INJURIES OR DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER IN CONTRACT, WARRANTY, TORT, NEGLIGENCE, STRICT LIABILITY OR OTHERWISE, SHALL NOT EXCEED THE PURCHASE PRICE PAID, OR AT REDEAGLE INTERNATIONAL LLC'S ELECTION, THE REPLACEMENT OF PRODUCT.

Federal Express

March 27th, 2016

Document Processing Desk (REGFEE)
Attn: Kathryn Montague, PM 23
Registration Division
U.S. Environmental Protection Agency
Office of Pesticide Programs (7505P)
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202-4501



Dear Ms. Montague,

Subject: Application to register a new manufacturing use product containing a currently registered active ingredient - "Dicamba Technical"

Wagner Regulatory Associates, Inc., as agent for RedEagle International LLC (EPA Co. 85678), is requesting registration of the above referenced product containing the currently registered active ingredient Dicamba (PC code 29801).

In support of this request, the following documents and studies are attached:

- Letter from RedEagle International LLC appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Registration (8570-1)
- Confidential Statement of Formula (8570-4)
- Certification with Respect to Citation of Data (8570-34)
- Data Matrix (8570-35), internal and public copies
- Data Transmittal Document
- Data as outlined in the transmittal document
- Draft label Certification with Respect to Label Integrity
- A copy of the receipt confirming payment of the required registration fees for PRIA R334.

RedEagle International LLC has submitted payment to U.S.EPA in accordance with PRIA Fee Table – FY14/FY15, for action category R334 - \$19,838.

If you need to contact me about this submission I can be reached by email and telephone as noted below.
Thank you for your consideration of this request.

Respectfully submitted,

A handwritten signature in black ink, which appears to read "James M. Wagner".

James M. Wagner
Agent for RedEagle International LLC
Enclosures

DOCUMENTUS

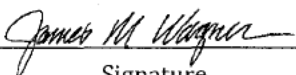
DATA TRANSMITTAL DOCUMENT

1. **Name and Address of Submitter**
RedEagle International LLC
c/o Wagner Regulatory Associates
PO Box 640
Hockessin, DE 19707
2. **Regulatory Action In Support Of Which This Package Is Submitted**
Dicamba Technical
EPA Reg. No. Pending
Application for New TGAI Registration
3. **Transmittal Date**
April 27, 2016
4. **List of Submitted Studies**

49875901	RedEagle Dicamba Technical: Product Identity and Composition, Description of Materials Used to Produce the Product, Description of Production Process, Discussion on the Formation of Impurities, Toxicity of Impurities and Certified Limits, OPPTS Guideline 830.1550, 1600, 1620, 1650, 1670, and 1750
49875902	Polychlorinated Dibenzodioxins And Polychlorinated Dibenzofurans Analysis Of Dicamba TGAI, OPPTS Guideline 830.1700, 830.1800
49875903	Preliminary Analysis of Dicamba Technical Grade Active Ingredient, OPPTS Guidelines 830.1700, 830.1800
49875904	Physical and Chemical Characteristics of Dicamba Technical Grade Active Ingredient, OPPTS Guidelines 830.6302, .6303, .6304, .6313, .7000, .7050, .7200, .7300
49875905	Product Chemistry – Group B: Open Literature Citation and Request for Waiver for Certain Physical / Chemical Properties Data OPPTS 830 Series: 6314, 6315, 6316, 6317; 6319; 6320; 6321; 7100; 7220; 7370; 7520; 7550; 7560; 7570; 7840; 7860; 7950

Company Official:

James M. Wagner
Authorized Agent


Signature

Company Name: RedEagle International LLC

Company Contact: James M. Wagner
Authorized Agent

(302) 635-7290
Phone

DOCUMENT USE



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460
OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION
OFFICE OF PESTICIDE PROGRAMS REGISTRATION DIVISION (7505P)

FEE

DP BARCODE No.: D434290; **FILE SYMBOL No.:** 85678-UN; **PRODUCT NAME:** Dicamba Technical;
DECISION No.: 516787; **PC Code(s):** 029801; **ACTION CODE:** R334; **FOOD Use:** Yes

DATE: March 28, 2017

SUBJECT: Product Chemistry Review of "Dicamba Technical"

FROM: Shyam Mathur, Ph. D
Product Chemistry Team Leader
Chemistry, Inerts & Toxicology Assessment Branch (CITAB)/RD (7505P)

Shyam Mathur 03/29/17
LR

TO: Grant Rowland / Kathryn Montague, RM 23
Herbicide Branch / RD (7505P)

REGISTRANT: RedEagle International
MRID Numbers: 49875901 to 49875905

INTRODUCTION:

The Wagner Regulatory Associates on behalf the registrant has submitted an application for the registration of the new technical product Dicamba Technical. In support of the application, the registrant has submitted a basic CSF (dated April 27, 2016) and the supporting product chemistry data with MRID Nos. 49875901 to 49875905. The Dicamba Technical is produced at [REDACTED]

CITAB has been asked to determine the acceptability of the proposed basic CSF & the supporting product chemistry data.

SUMMARY OF FINDINGS:

1. Group A guidelines:

830.1550 (product identity & composition)

The submitted data are acceptable. Active ingredient and process-related impurities were adequately described (MRID 49875901 and basic CSF). The nominal concentration of the active ingredient in the proposed basic CSF (98.76%, nominal) is the average derived from the 5 batch preliminary analysis. The information presented meets the data requirements for 40CFR 158.320

830.1600 (description of materials used to produce the product)

The product chemistry data submitted for the guideline 830.1600 (description of starting materials) are acceptable. The MSDSs of all the starting materials, and their suppliers and specifications are provided in the study with MRID 49875901. The information presented meets the data requirements for 40CFR 158.325.

Product ingredient source information may be entitled to confidential treatment

DP BARCODE No.: D434290; **FILE SYMBOL No.:** 85678-UN; **PRODUCT NAME:** Dicamba Technical;
DECISION No.: 516787; **PC Code(s):** 029801; **ACTION CODE:** R334; **FOOD Use:** Yes

830.1620 (description of production process)

The product chemistry data submitted data for the guideline 830.1620 (description of production process) are acceptable. The dicamba technical was produced in [REDACTED]

[REDACTED] The registrant has provided details of the each step of the production process with flow charts, chemical reactions pathways, and quality control measures in MRID 49875901. The information presented meets the data requirements for 40CFR 158.330.

830.1670 (discussion on the formation of impurities)

The product chemistry data submitted for the guideline 830.1670 (discussion on the formation of impurities) are acceptable. Detailed information regarding the origins of impurities was provided (MRID 49875901). Potential impurities were identified and quantified as part of the five-batch analysis (MRID 49875903 & -02). The registrant identified & quantified [REDACTED] impurities at the concentrations of $\geq 0.1\%$, in the technical product which are listed on the basic CSF (dated 04-27-2016). The registrant has provided mechanisms of their formation. The registrant has also analyzed the product for the trace amounts of polychlorinated dibenzodioxins and polychlorinated dibenzofurans. These impurities are present at the concentrations below the acceptable threshold limits and are listed on the proposed basic CSF. The information presented meets the data requirements for 40CFR 158.340.

830.1700 (preliminary analysis)

The five-batch analysis of the dicamba technical was conducted to determine the contents of the active ingredient and the associated impurities as described under MRID No. 49875902 & -03. The five batches analyzed were obtained from the facility located at [REDACTED]

[REDACTED] The five batch analysis was performed by Southwest Research Institute, San Antonio, TX, USA. The contents of the AI & impurities were determined by validated SwRI TAP-01-0408-094 by HPLC using a PDA detector monitoring a UV range of 210 nm to 400 nm with external standard quantification. GC-MS was also used according to SwRI TAP01-0408-095 to search any possible unknown impurities present at or above 0.1% in the technical sample. The mass selective detector was run in full-scan mode monitoring a mass range of 15 to 550 amu. Trace level dioxin and furan analyses were performed according to modified SwRI TAP 01-0403-012 "Determination of Polychlorinated Dibenzodioxins (PCDDs) and Polychlorinated Dibenzofurans (PCDFs) in Phenoxyacid Herbicide by HRGC/HRMS". This method was validated for precision and accuracy. Both analytes and internal standards were determined by operating the HRGC/HRMS in a selected-ion monitoring mode. Two quantification masses were monitored for each analyte and internal standard. The details of the analytical methods and validation have been submitted. The analytical methods were validated for linearity, accuracy & precision. The data submitted satisfy the data requirements of 40CFR§158.345.

830.1750 (certified limits)

The product chemistry data submitted for the guideline 830.1750 satisfy the data requirements of 40CFR§158.350. The registrant has proposed the nominal concentration of 98.76% for the active ingredient which is also the product label claim nominal concentration. The proposed upper and lower certified limits for the A.I. are based on the standard certified limits, whereas the certified limits for the impurities are based on batch analysis (MRID No. 49875901).

DP BARCODE No.: D434290; **FILE SYMBOL No.:** 85678-UN; **PRODUCT NAME:** Dicamba Technical;
DECISION No.: 516787; **PC Code(s):** 029801; **ACTION CODE:** R334; **FOOD Use:** Yes

830.1800 (enforcement analytical method)

The analytical methods (HPLC-UV) & LC/MS were validated for linearity, LOD & LOQ, Selectivity/ Specificity. A high performance liquid chromatography (HPLC-UV) method (SwRI TAP 01-0408-094) with detector operating at 210 nm to 400 nm was used for the determination of the active ingredient dicamba. The quantitation was done by external standard method. Trace level dioxin and furan analyses were performed according to modified SwRI TAP 01-0403-012 "Determination of Polychlorinated Dibenzodioxins (PCDDs) and Polychlorinated Dibenzofurans (PCDFs) in Phenoxy acid Herbicide by HRGC/HRMS". This method was validated for precision and accuracy. The information presented meets the data requirements for 40 CFR §158.355 [MRID No. 49875902 & 49875903].

2. Group B guidelines (physical-chemical properties):

The submitted group B product chemistry under MRID No. 49875904 & 49875905, satisfy the data requirements of 40CFR§158.310.

CONCLUSIONS:

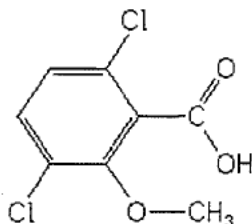
The CITAB has reviewed the proposed basic CSF and the supporting group A and group B data for Dicamba Technical and has concluded that:

1. The product chemistry data submitted for guidelines 830.1550 (product identity & composition), 830.1600 (description of materials used to produce the product), 830.1620 (description of the production process), 830.1670 (discussion of the formation of impurities), 830.1700 (preliminary analysis) and 830.1800 (enforcement analytical method) are acceptable.
2. The proposed basic CSF (dated 04-27-2016) is acceptable. The nominal concentration of 98.76% is supported by the five batch analysis and agrees with the product label claim nominal concentration.
3. The group B product chemistry data submitted & cited are acceptable including for the guidelines 830.6317 (storage stability) study.
- ★ 4. The registrant is recommended to revise the ingredient statement on the product label, so that the nominal concentration of the active ingredient of 98.76% concurs with the NC of the AI on the product label. The amount of "Other Ingredients" must be adjusted so that the total adds to 100%.
5. According to the Toxicologist of CITAB, the trace levels of dioxin and furan as determined during the 5 batch analysis are present at the acceptable concentrations. Impurities of tox concern (PCDD's & PCDF's) were analyzed at levels below 0.1 ppb. The levels of detection are in compliance with June 15, 1987 DCI for Analytical Chemistry Data on PCDD's & PCDF's.

DP BARCODE No.: D434290; **FILE SYMBOL No.:** 85678-UN; **PRODUCT NAME:** Dicamba Technical;
DECISION No.: 516787; **PC Code(s):** 029801; **ACTION CODE:** R334; **FOOD Use:** Yes

830.1550. Product identity & composition: (MRID No.49875901)

Common name : Dicamba
CAS Chemical Name: 3,6-dichloro-2-methoxybenzoic acid
CAS No. : 1918-00-9
EPA PC code: 29801
Molecular Formula: $C_8H_6Cl_2O_3$
Molecular Weight: 221.04 g/mol
Structural formula:



DP BARCODE No.: D434290; **FILE SYMBOL No.:** 85678-UN; **PRODUCT NAME:** Dicamba Technical;
DECISION No.: 516787; **PC Code(s):** 029801; **ACTION CODE:** R334; **FOOD Use:** Yes

Table 1. Manufacturing and Impurity Data for "Dicamba Technical"				
GLN	Requirement	MRID	Status	Details and /or Deficiency
830.1550	Product Identity and composition	49875901	A	See under summary of findings
830.1600	Description of materials used to produce the product	49875901	A	See under summary of findings
830.1620	Description of production process	49875901	A	See under summary of findings
830.1670	Discussion of formation of impurities	49875901	A	See under summary of findings
830.1700	Preliminary analysis	49875902 49875903	A	See under summary of findings
830.1750	Certified limits	Basic CSF (dated 4-27-16)	A	See under summary of findings
830.1800	Enforcement analytical method	49875902 49875903	A	See under summary of findings
A = Acceptable; N = Unacceptable (see Deficiency); N/A = Not Applicable; G = Data gap; I = In progress; U = Up-grade (additional information required);				

DP BARCODE No.: D434290; FILE SYMBOL No.: 85678-UN; PRODUCT NAME: Dicamba Technical;
 DECISION No.: 516787; PC Code(s): 029801; ACTION CODE: R334; FOOD Use: Yes

830 Series Subgroup B (Physical-Chemical Properties)

Table 2: Physical and Chemical Properties for "Dicamba Technical"				
GLN	Requirement	MRID	Status	Result or Deficiency
830.6302	Color	49875904	A	Brownish
830.6303	Physical state	49875904	A	Crystalline Solid @ 20°C
830.6304	Odor	49875904	A	Odorless
830.6313 830.6317	Stability to normal and elevated temperatures, metals, and metal ions Accelerated storage stability	49875904	A	TS was found to be stable at RT & 54°C TS was found to be stable at RT & 54°C when put in contact with Fe & Al metal and corresponding acetate ions
830.6314	Oxidation/reduction: chemical incompatibility	49879505	A	Waiver request. This solid product is a TGA and does not contain any oxidizing or reducing agents therefore it is requested that the requirement for this data be waived.
830.6315	Flammability	49875905	A	TGA is a solid and will not self-ignite nor is highly flammable substance Reference: University of Hertfordshire Pesticide Properties Database www.sitem.herts.ac.uk/aeru/ppdb/en/
830.6316	Explodability	49875905	A	Waiver request. TS does not have potential to explode and is solid TGA
830.6317	Accelerated storage stability	49875904	A	The Test Item is stable for 14 Days at room Temperature and at 54±2°C.
830.6319	Miscibility	49875905	NA	Not applicable to solid products and is not an emulsifiable liquid
830.6320	Accelerated Corrosion characteristics	49875904	A	No corrosion of the PE/EV containers after storage for 14 days at room temperature and 54±2°C
830.7000	pH	49875904	A	2.3 at 20°C (1% w/v aqueous dispersion)
830.7050	UV/Visible absorption	49875904	A	Alkaline: Log ϵ =2.67 @ λ_{max} 273 nm Log ϵ =4.31 @ λ_{max} 214 nm Neutral: Log ϵ =2.95 @ λ_{max} 282 nm Log ϵ =4.19 @ λ_{max} 209 nm Acidic: Log ϵ =3.00 @ λ_{max} 283 nm Log ϵ =4.17 @ λ_{max} 208 nm
830.7100	Viscosity	49875905	NA	TS is a solid
830.7200	Melting point	49875904	A	109°C
830.7220	Boiling point	49875905	NA	
830.7300	Density	49875904	A	1.51 g/cc @22°C
830.7370	Dissociation constants in water (DC)	49875904 49875905 cited	A	pKa = 1.97 @20°C The Pesticide Manual, 13 th Edition, Page # 279

DP BARCODE No.: D434290, FILE SYMBOL No.: 85678-UN; PRODUCT NAME: Dicamba Technical;
 DECISION No.: 516787; PC Code(s): 029801; ACTION CODE: R334; FOOD Use: Yes

Table 2: Physical and Chemical Properties for "Dicamba Technical"				
GLN	Requirement	MRID	Status	Result or Deficiency
830.7550	Partition coefficient	49875904 49875905 cited	A	Log P _{o/w} = -0.55 @ pH 5.0; -1.88 @ pH 6.8; -1.9 @ pH8.9 The Pesticide Manual, 13 th Edition, Page # 279
830.7840	Water solubility	49875904 49875905 cited	A	Water = 6.1 g/L (unbuffered water) @ 25°C The Pesticide Manual, 13 th Edition, Page # 279
830.7950	Vapor pressure*	49875904 49875905 cited	A	1.67 mPa @ 25°C The Pesticide Manual, 13 th Edition, Page # 279
A = Acceptable; N = unacceptable (see Deficiency); N/A = Not Applicable; G = Data gap; I = In progress; U = Up-grade (additional information required); W = waivers				

DP BARCODE No.: D434290; **FILE SYMBOL No.:** 85678-UN; **PRODUCT NAME:** Dicamba Technical;
DECISION No.: 516787; **PC Code(s):** 029801; **ACTION CODE:** R334; **FOOD Use:** Yes

830.1800 (enforcement analytical method)
(MRID No. 49959803)

The content of the active ingredient dicamba was determined by HPLC-UV method with external standard quantification. A calibration curve for dicamba was calculated using linear regression; the concentration of dicamba will be calculated using these curves. The purity concentration of dicamba in TGA1 sample was then calculated by multiplying the concentration in the sample by the final volume and any dilution factor, and divided by the weight of the sample used.

Equipment and Parameters

HPLC: Waters HPLC

Column: Supelco Discovery C18 (25 cm x 4.6 mm, 5 µm)

Detector: PDA monitoring a UV range of 210 to 400 nm

Mobile phase: 60% MeOH : 40% pH3 Milli-Q water adjusted with o-phosphoric acid.

Flow rate: 1.0 ml/min

Method was validated for accuracy, linearity, precision, selectivity/specificity & LOQ.

DP BARCODE No.: D434290; **FILE SYMBOL No.:** 85678-UN; **PRODUCT NAME:** Dicamba Technical;
DECISION No.: 516787; **PC Code(s):** 029801; **ACTION CODE:** R334; **FOOD Use:** Yes

CONFIDENTIAL APPENDIX

Pages 18-27 Manufacturing process information may be entitled to confidential treatment



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND
POLLUTION PREVENTION

OFFICE OF PESTICIDE PROGRAMS
REGISTRATION DIVISION

10/MAY/2016

SIMILARITY CLINIC MEMORANDUM

Subject: Name of Pesticide Product: Dicamba Technical
EPA Reg. No. /File Symbol: 85678-UN
DP Barcode: D433438
Decision No: 516787
Action Code: R334
PC Code: 029801 (dicamba)

From: Eugenia McAndrew, Biologist *Eugenia McAndrew*

Through: John C. Redden, M.S., Senior Risk Assessor *JCR*
Chemistry, Inerts and Toxicology Assessment Branch
Registration Division (7505P)

To: Kathryn Montague, Risk Manager Team 23
Herbicide Branch
Registration Division (7505P)

Applicant: RedEagle International LLC
P.O. Box 640
Hockessin, DE 19707

FORMULATION FROM LABEL:

<u>Active Ingredient(s):</u>	<u>% by wt.</u>
Dicamba	99.1
Other ingredients:	<u>.9</u>
Total:	100.0

ACTION REQUESTED: Similarity determination for 85678-UN, proposed product, and 42750-57, cited product.

BACKGROUND: RedEagle International LLC has applied for registration of Dicamba Technical, EPA File Symbol 85678-UN, claiming to be substantially similar to Albaugh Technical Dicamba Acid, EPA Reg. No. 42750-57. Both products are technical grade for manufacturing use only. The submission includes a basic CSF dated April 27, 2016, label, data matrix and company letter.

The registrant is using the selective method of data support to satisfy the acute toxicity data requirements. The data matrix cites these acute toxicity studies: acute oral (MRID 00078444), acute dermal (MRID 00241584), acute inhalation (MRID 00263861), primary eye irritation (MRID 00241584) primary skin irritation (MRID 00237955) and dermal sensitization (MRID 00263861). We note that these studies are cited in the Reregistration Eligibility Decision for Dicamba and Associated Salts (June 8, 2006) to characterize the acute toxicity profile of dicamba technical. The toxicity profile for dicamba technical based on these studies is as follows:

acute oral toxicity	III
acute dermal toxicity	III
acute inhalation toxicity	IV
primary eye irritation	II
primary skin irritation	II
dermal sensitization	negative

In comparing the toxicity categories for the above cited data with the label for the cited product, we note that the toxicity profiles are not the same. The cited studies, therefore, are not acceptable to support this registration.

A search of the OPP electronic databases shows that the Product Reregistration Branch in the Special Review and Reregistration Division assigned an acute toxicity profile to 42750-57 during reregistration (Dupuy; D363560; EPA Reg. No. 42750-57; 16/APR/2009). The currently accepted label for 42750-57 agrees with the toxicity profile assigned in this memo except for dermal toxicity.

RECOMMENDATIONS:

1. We compared the basic CSFs and labels of the proposed product, 85678-UN, and the cited product, 42750-57, and determined that the two products are substantially similar.
2. The acute toxicity profile for the proposed product, Dicamba Technical, EPA File Symbol 85678-UN, based on EPA Reg. No. 42750-57, is as follows:

acute oral toxicity	III	cited	EPA Reg. No. 42750-57
acute dermal toxicity	III	cited	EPA Reg. No. 42750-57
acute inhalation toxicity	IV	cited	EPA Reg. No. 42750-57
primary eye irritation	I	cited	EPA Reg. No. 42750-57
primary skin irritation	IV	cited	EPA Reg. No. 42750-57
dermal sensitization	negative	cited	EPA Reg. No. 42750-57

3. The proposed basic CSF submitted for 85678-UN must be reviewed and accepted by the product chemists in the Chemistry, Inerts and Toxicology Assessment Branch.

LABELING: Based on the toxicity profile above, the following are the precautionary and first aid statements for this product as obtained from the Label Review System:

PRODUCT ID #: 085678-00040

PRODUCT NAME: Dicamba Technical

PRECAUTIONARY STATEMENTS

SIGNAL WORD: DANGER

Hazards to Humans and Domestic Animals:

Corrosive. Causes irreversible eye damage. Harmful if swallowed or absorbed through skin. Do not get in eyes or on clothing. Avoid contact with skin. Wear protective eyewear (goggles, face shield, or safety glasses). Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

First Aid:

If in eyes:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.
- Call a poison control center or doctor for treatment advice.

If on skin:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice.

If swallowed:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to by a poison control center or doctor.
- Do not give anything to an unconscious person.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

Note to Physician:

Probable mucosal damage may contraindicate the use of gastric lavage.



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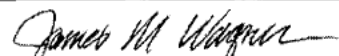
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DATA MATRIX

Date: April 27, 2016	EPA Reg No./ File Symbol: 85290-xx	Page 1 of 11
Applicant's/Registrant's Name and Address: RedEagle International LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640 Hockessin, DE 19707		Product: Dicamba Technical
Ingredient: Dicamba (PC 29801)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
PRODUCT SPECIFIC					
830 Series Group A	Product Identity, Materials, Production Process, Impurities	49875901	RedEagle International	Own	
830.1700	Preliminary Analysis	49875903 49875902	RedEagle International	Own	
830.1750	Certified limits	49875901	RedEagle International	Own	
830.1800	Enforcement Analytical Method	49875904	RedEagle International	Own	
830.6302, 830.6303, 830.6304	Color, Odor, Physical State	49875904	RedEagle International	Own	
830.6313	Stability to normal and elevated temperatures	49875904	RedEagle International	Own	
830.6314	Chemical Incompatibility	49875904	RedEagle International	Own	
830.6315	Flammability	49875905			Product is a TGA therefore guideline not applicable.
830.6316	Explosibility	59875905			Product is a TGA therefore guideline not applicable.
830.6317	Storage stability	49875904	RedEagle International	Own	
830.6319	Miscibility	49875905			Product is a TGA therefore guideline not applicable.
830.6320	Corrosion characteristics	49875904	RedEagle International	Own	
830.6321	Dielectric breakdown voltage	49875905			Product is a TGA therefore guideline not applicable.
830.7000	pH	49875904	RedEagle International	Own	
830.7050	UV-Visible Absorption	49875904	RedEagle International	Own	

Signature 	Name and Title James M. Wagner, Agent	Date April 27, 2016
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Date: April 27, 2016	EPA Reg No./ File Symbol: 85290-xx	Page 2 of 11
Applicant's/Registrant's Name and Address: RedEagle International LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640 Hockessin, DE 19707	Product: Dicamba Technical	

Ingredient: Dicamba (PC 29801)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7100	Viscosity	49875905			Product is a TGA1 therefore guideline not applicable.
830.7200	Melting Point	49875904			
830.7220	Boiling Point	49875905	RedEagle International	Own	Product is a solid therefore guideline no applicable.
830.7300	Density	49875904	RedEagle International	Own	
830.7370	Dissociation constant in water	43288001, 43140308, 44520902	RedEagle International	Own	
	Particle size, fiber diameter and particle distribution				Product is a TGA1 therefore guideline not applicable.
830.7550	Octanol Water Partition Coefficient	41966601, 23106	BASF Corporation	Old	
830.7840	Solubility in Water and Organic Solvents	49875904	RedEagle International	Own	
830.7950	Vapor Pressure	23106	BASF Corporation	Old	
835.1230	Adsorption/Desorption	42774101	BASF Corporation	Old	
835.1240	Leaching	43095301	BASF Corporation	Old	
835.1410	Volatility Laboratory	41966602	BASF Corporation	Old	
835.2130	Hydrolysis	40335501	BASF Corporation	Old	
835.2240	Aqueous Photolysis	42774103	BASF Corporation	Old	
835.2410	Soil Photolysis	42774103	BASF Corporation	Old	
835.4100	Aerobic Soil Metabolism	43245207	BASF Corporation	Old	
835.4200	Anaerobic Soil Metabolism	43245208	BASF Corporation	Old	

Signature

James M. Wagner

Name and Title

James M. Wagner, Agent

Date

April 27, 2016




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DATA MATRIX

Date: April 27, 2016	EPA Reg No./ File Symbol: 85290-xx	Page 3 of 11
Applicant's/Registrant's Name and Address: RedEagle International LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640 Hockessin, DE 19707	Product: Dicamba Technical	
Ingredient: Dicamba (PC 29801)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
835.4300	Aerobic Aquatic Metabolism	43758509	BASF Corporation	Old	
835.4400	Anaerobic Aquatic Metabolism	43245208	BASF Corporation	Old	
835.6100	Terrestrial Field Dissipation	44959001 42754101, 42754102, 44361526 44373708 48718005	BASF Corporation	Old Old Old Old Old Pay	
835.6200	Aquatic Field Dissipation				Product does not have aquatic uses therefore this guideline is not applicable.
850.1010	Freshwater Invertebrate Acute Toxicity	0052126 40094602	BASF Corporation	Old Old	
850.1025	Oyster Acute Toxicity	40228401	BASF Corporation	Old	
850.1035	Saltwater Crustacean Toxicity - Shrimp	0034702 40098001	BASF Corporation	Old Old	
850.1075	Freshwater Fish Acute Toxicity - Trout	0041272 0036915 40098001	BASF Corporation	Old Old Old	
850.1075	Freshwater Fish Acute Toxicity - Bluegill	0034703 40098001	BASF Corporation	Old Old	
850.1075	Freshwater Fish Acute Toxicity - Fathead minnow	48718008	BASF Corporation	Pay	

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DATA MATRIX

Date: April 27, 2016	EPA Reg No/ File Symbol: 85290-xx	Page 4 of 11
Applicant's/Registrant's Name and Address: RedEagle International LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640 Hockessin, DE 19707		Product: Dicamba Technical

Ingredient: Dicamba (PC 29801)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
850.1075	Saltwater Fish Acute Toxicity - Sheepshead minnow	0025390	BASF Corporation	Old	
850.1300	Freshwater Invertebrate Life Cycle	48718007	BASF Corporation	Pay	
850.1350	Saltwater Invertebrate Life Cycle	48718012	BASF Corporation	Pay	
850.1400	Freshwater Fish Early Life-Stage	48718010	BASF Corporation	Pay	
850.1400	Saltwater Fish Early Life-Stage	48718011	BASF Corporation	Pay	
850.1500	Fish Life Cycle		BASF Corporation	Old	
850.1730	Fish Bioconcentration		BASF Corporation	Old	
850.2100	Avian Oral Toxicity - Mallard Duck	42774106	BASF Corporation	Old	
850.2100	Avian Oral Toxicity - Bobwhite Quail	42774105	BASF Corporation	Old	
850.2100	Avian Oral Toxicity - Passerine spp.	48718013	BASF Corporation	Pay	
850.2200	Avian Dietary Toxicity - Bobwhite Quail	0025391	BASF Corporation	Old	
850.2200	Avian Dietary Toxicity - Mallard Duck		BASF Corporation	Old	
850.2300	Avian Reproduction - Bobwhite Quail	43814004	BASF Corporation	Old	
850.2300	Avian Reproduction - Mallard Duck	43814003	BASF Corporation	Old	
850.3020	Honey Bee Acute Contact Toxicity	00036935	BASF Corporation	Old	
Non-guideline	Honey Bee Acute Oral Toxicity			Gap	No data can be located in published EPA documents for Dicamba.
Non-guideline	Honey Bee Chronic Oral Toxicity - Adults			Gap	No data can be located in published EPA documents for Dicamba.
Non-guideline	Honey Bee Chronic Oral Toxicity - Larvae			Gap	No data can be located in published EPA documents for Dicamba.

Signature

James M. Wagner

Name and Title

James M. Wagner, Agent

Date

April 27, 2016




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Date: April 27, 2016	EPA Reg No./ File Symbol: 85290-xx	Page 5 of 11
Applicant's/Registrant's Name and Address: RedEagle International LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640 Hockessin, DE 19707		Product: Dicamba Technical
Ingredient: Dicamba (PC 29801)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
850.4100	Seedling Emergence and Growth	42846301	BASF Corporation	Old	
850.4150	Vegetative Vigor	42846301	BASF Corporation	Old	
850.4400	Aquatic Plant Toxicity Lemna spp.	42774111	BASF Corporation	Old	
850.4500	Algal Toxicity with Green Algae	42774107 42774110 42774109	BASF Corporation BASF Corporation BASF Corporation	Old	
850.4500	Algal Toxicity with Freshwater diatom	42774108	BASF Corporation	Old	
850.4500	Algal Toxicity with Saltwater diatom		BASF Corporation	Old	
870.1100	Acute Oral Toxicity - rat	00078444	BASF Corporation	Old	
870.1200	Acute Dermal Toxicity - rat	00241584	BASF Corporation	Old	
870.1300	Acute Inhalation Toxicity - rat	00263861	BASF Corporation	Old	
870.2400	Eye Irritation - rabbit	00241584	BASF Corporation	Old	
870.2500	Skin Irritation - rabbit	00237955	BASF Corporation	Old	
870.2600	Skin Sensitization	00263861	BASF Corporation	Old	
870.3100	Oral Subchronic - mouse		BASF Corporation	Old	
870.3100	Oral Subchronic - rat	00128093 44623101	BASF Corporation	Old	
870.3150	Oral Subchronic - dog				No data can be located in published EPA documents for Dicamba.
870.3200	21/28-Day Dermal - rabbit	45814501 40547901	BASF Corporation BASF Corporation	Pay Old	

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Applicant's/Registrant's Name and Address: RedEagle International LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640 Hockessin, DE 19707	Product: Dicamba Technical	
Ingredient: Dicamba (PC 29801)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.3465	4 week Inhalation Toxicity				
870.3700a	Developmental Toxicity - rat	00084024	BASF Corporation	OLD	
870.3700b	Developmental Toxicity - rabbit	42429401	BASF Corporation	OLD	
870.3800	Reproduction - rat	43137101	BASF Corporation	OLD	
870.4100b	Chronic Toxicity - dog	40321102	BASF Corporation	OLD	
870.4200a	Carcinogenicity - rat	00146150	BASF Corporation	Old	
870.4200b	Carcinogenicity - mouse	40872401	BASF Corporation	Old	
870.4300	Combined Chronic/Carcinogenicity -rat	00146150	BASF Corporation	Old	
870.5100	Mutagenicity Bacterial Reverse Mutation	40321101	BASF Corporation	Old	
870.5300	Mutagenicity—In Vitro Mammalian Cell Gene Mutation	00143001	BASF Corporation	Old	
870.5375	Mutagenicity—Structural Chromosomal Aberrations	40321101, 00143001	BASF Corporation	Old	
870.5395	Mammalian Micronucleus Mouse		BASF Corporation	Old	
870.6200a	Acute Neurotoxicity Screening Battery	42774104	BASF Corporation	Old	
870.6200b	Subchronic Neurotoxicity Screening Battery	43245210	BASF Corporation	Old	
870.6300	Developmental Neurotoxicity (rat)		BASF Corporation	Old	
870.7485	General Metabolism - rat	44609801	BASF Corporation	Old	
870.7485	Metabolism and Pharmacokinetics - rat	46022302 46022303	BASF Corporation		
870.7600	Dermal Penetration		BASF Corporation	Old	
870.7800	Immunotoxicity	48081601	BASF Corporation	Pay	

Signature 	Name and Title James M. Wagner, Agent	Date April 27, 2016
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DATA MATRIX

Date: April 27, 2016	EPA Reg No./ File Symbol: 85290-xx	Page 7 of 11
Applicant's/Registrant's Name and Address: RedEagle International LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640 Hockessin, DE 19707		Product: Dicamba Technical

Ingredient: Dicamba (PC 29801)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
875.2100	Transferable Foliar Residues		BASF Corporation	Old	
860.1850	Confined Accumulation in Rotational Crops	41972001 43698601	BASF Corporation	Old	
860.1900	Field Accumulation in Rotational Crops				Data not required per EPA RED 2006
860.1300	Nature of Residue - crops	40642801	BASF Corporation	Old	
860.1300	Nature of Residue - Poultry	43245202 43814104	BASF Corporation	Old	
860.1300	Nature of Residue - Cow/Goat	43245201	BASF Corporation	Old	
860.1340	Analytical Method - Animal Tissues	43461701 43554205	BASF Corporation	Old	
860.1340	Analytical Method - Crops	42883201 44394102 40233501 43814002 43814104 43814103	BASF Corporation	Old	
860.1360	Multiresidue Analytical Method	PAM Vol. I	BASF Corporation		EPA RED 2006

Signature 	Name and Title James M. Wagner, Agent	Date April 27, 2016
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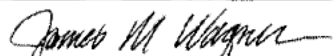
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DATA MATRIX

Date: April 27, 2016	EPA Reg No./ File Symbol: 85290-xx	Page 8 of 11
Applicant's/Registrant's Name and Address: RedEagle International LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640 Hockessin, DE 19707		Product: Dicamba Technical

Ingredient: Dicamba (PC 29801)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1380	Storage Stability Data - crops	43245204 43245205 43245206 43274501 43370701 43866601 43814102	BASF Corporation	Old	
860.1380	Storage Stability Data - animal tissues and milk				No data can be located in published EPA documents for Dicamba.
860.1480	Meat/Poultry/Eggs	00079742 00116671 00148127 44891303	BASF Corporation	Old	

Signature 	Name and Title James M. Wagner, Agent	Date April 27, 2016
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DATA MATRIX

Date: April 27, 2016

EPA Reg No./ File Symbol: 85290-xx

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Applicant's/Registrant's Name and Address:

RedEagle International LLC
c/o Wagner Regulatory Associates Inc.
P.O. Box 640
Hockessin, DE 19707

Product:

Dicamba Technical

Ingredient: Dicamba (PC 29801)

860.1500	Crop Field Trials	40663801 42675901 43245203 43245204 43245205 43245206 43274501 43370701 43425803 43698601 43814001 43814101 43814102 43814102 43866601 44089302 44089303 44089303 44089304 44089304 44089305 44089305 44089305 44089305 44089306	BASF Corporation	Old	
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Signature

Name and Title

James M. Wagner, Agent

Date

April 27, 2016



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DATA MATRIX

Date: April 27, 2016

EPA Reg No./ File Symbol: 85290-xx

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Applicant's/Registrant's Name and Address:

RedEagle International LLC
c/o Wagner Regulatory Associates Inc.
P.O. Box 640
Hockessin, DE 19707

Product:

Dicamba Technical

Ingredient: Dicamba (PC 29801)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
		44089307 44089307 44891302 45154001			
860.1520	Processed Food/Feed	41187301 43245205 43814102 44089305 43814001 00030701 00079738 00149626 44089302 43245204 40663801 42675901	BASF Corporation	Pay	
Subpart K - Human Exposure (Series 875)	Applicator Exposure and Post application Exposure Data	CITE ALL	Ag Handlers Exposure Task Force Ag Reentry Exposure Task Force	Pay Pay	

Signature

Name and Title

James M. Wagner, Agent

Date

April 27, 2016



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

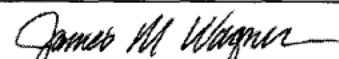
Form Approved OMB No. 2070-0060

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instruction and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington DC 20460. Do not send the form to this address.

DATA MATRIX

Date: April 27, 2016	EPA Reg No./ File Symbol: 85290-xx	Page 11 of 11
Applicant's/Registrant's Name and Address: RedEagle International LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640 Hockessin, DE 19707	Product: Dicamba Technical	
Ingredient: Dicamba (PC 29801)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
875.2100	Turf Transferrable Residue	44655702, 45033101 44655703	Broadleaf Turf Herbicide TFR Task Force	Old	
875.2200	Soil Residue Dissipation	44959001	BASF Corporation	Old	
Subpart L - Spray Drift	Spray Drift Data	CITE ALL	Spray Drift Task Force	Old	

Signature 	Name and Title James M. Wagner, Agent	Date April 27, 2016
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Receipt

Your payment is complete

Pay.gov Tracking ID: 25R95UO5

Agency Tracking ID: 75003808623

Form Name: Pesticide Registration Improvement Act - Prepayment

Application Name: PRIA Service Fees

Payment Information

Payment Type: Debit or credit card

Payment Amount: \$19,838.00

Transaction Date: 04/26/2016 02:48:23 PM EDT

Payment Date: 04/26/2016

Registration Number:

Company Name: RedEagle International

Company Number: 85678

Action Code: R334

Account Information

Cardholder Name: Cheryl R. Wagner

Card Type: American Express

Card Number: *****2008

Email Confirmation Receipt

Confirmation Receipts have been emailed to:

cheryl@wagnerreg.com

carrie@wagnerreg.com

20th CENTURY



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

May 2, 2016

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

OPP Decision Number: D-516787
EPA File Symbol or Registration Number: 85678-UN
Product Name: DICAMBA TECHNICAL
EPA Receipt Date: 27-Apr-2016
EPA Company Number: 85678
Company Name: REDEAGLE INTERNATIONAL LLC

JAMES WAGNER
WAGNER REGULATORY ASSOCIATES, INC.
REDEAGLE INTERNATIONAL LLC
PO Box 640
HOCKESSIN, DE 19707-

SUBJECT: Receipt of Registration Application Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your application and certification of payment. If you submitted data with this application, the results of the PRN-2011-3 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R334

NEW PRODUCT;MUP OR END USE PRODUCT WITH UNREGISTERED SOURCE OF
THE ACTIVE INGREDIENT;REQUIRES SCIENCE DATA REVIEW;NEW PHYSICAL
FORM;SELECTIVE DATA CITATION;


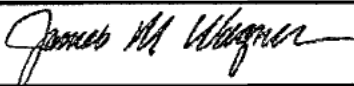
No additional payment is due at this time.

If you have any questions, please contact the Pesticide Registration Service Fee
Ombudsman at (703) 308-9362.

Sincerely,

Peresa Downs
Front End Processing Staff

Information Technology & Resources Management Division

 <div style="margin-left: 20px;"> United States Environmental Protection Agency Washington, DC 20460 </div>		<input checked="" type="checkbox"/> Registration <input type="checkbox"/> Amendment <input type="checkbox"/> Other	OPP Identifier Number
Application for Pesticide - Section I			
1. Company/Product Number 85678-XX		2. EPA Product Manager Kathryn Montague	
4. Company/Product (Name) RedEagle International LLC / Dicamba Technical		3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted	
5. Name and Address of Applicant (Include Zip Code) RedEagle International LLC c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. 42750-57 Product Name: Albaugh Technical Dicamba Acid	
Section - II			
<input type="checkbox"/> Amendment - Explain below. <input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input checked="" type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Notification - Explain below. <input type="checkbox"/> Other - Explain below.			
Explanation: Use additional page(s) if necessary. (For Section I and Section II.)			
Section - III			
1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Unit Packaging wgt. container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Package wgt container	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) HDPE lined bags
* Certification must be submitted			
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container Bulk	
		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Other _____ <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			
Section - IV			
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name James M. Wagner		Title Agent for RedEagle International LLC	
		Telephone No. (Include Area Code) (302) 635-7290	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 		3. Title Agent for RedEagle International LLC	
4. Typed Name James M. Wagner		5. Date April 27, 2016	

